

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In re Application of:

SCA-PALO ALTO, LLC

(New) FM Translator Station, Chan 237D  
San Francisco CA (Fac. ID #201186)

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File No. BNPFT-20171201AOT

TO: Secretary, Federal Communications Commission  
ATT: Chief, Audio Division, Media Bureau

**COMMENTS ON PETITION FOR RECONSIDERATION**

KRTY, Ltd. ("KRTY") (FRN 0006038954), licensee of Station KRTY(FM), Los Gatos, California (Fac. ID #35569), by its attorney, pursuant to Section 1.106(g) of the Commission's Rules, hereby comments on the April 5, 2018 "Petition for Reconsideration and Request for Reinstatement *Nunc Pro Tunc*" ("Petition") of SCA—PALO ALTO, LLC ("SCA"), which responded to the Commission's March 9, 2018 Letter dismissing SCA's subject application. The Petition purports to amend the application to "rectify...any interference concerns of KRTY" (Petition, p. 1).


1. KRTY appreciates SCA's stated desire to rectify KRTY's interference concerns through its amendment, and, therefore, KRTY does not oppose SCA's amendment. However, KRTY remains very concerned about actual interference that may be caused to KRTY's audiences in the event that SCA's translator station goes on the air; its amendment only deals with currently identified interference possibilities. In the event that actual interference arises at other locations once the station goes on air, KRTY will file a further documented objection. Since the likelihood of actual

interference in parts of KRTY's coverage area remains high, SCA may decide to forego building its proposed San Francisco FM translator station.

WHEREFORE, in light of the foregoing, KRTY, Ltd. does not oppose the subject Petition, but it expresses great skepticism that the proposed amendment will cure all of KRTY's concerns and stands ready to file further objections if required once the translator station goes on the air.

Respectfully submitted,

KRTY, Ltd.

By:   
Jerold L. Jacobs

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Its Attorney

Dated: April 16, 2018

**CERTIFICATE OF SERVICE**

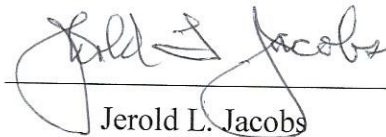
I, Jerold L. Jacobs, hereby certify that on this 16th of April, 2018, I caused the foregoing "Comments on Petition for Reconsideration" to be filed in ECFS and to be sent via First Class United States Mail and via e-mail to the following:

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Portals II, Filing Center, TW-A325  
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Jerold L. Jacobs